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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
-----X
G.S., a minor below the age of 18, by her
father and natural guardian, MORRIS S,

PLAINTIFFS,

-against- Case No:
15-CV-3086

CONGREGATION LEV BAIS YAAKOV d/b/a LEV BAIS
YAAKOV HIGH SCHOOL, RIVKA ORATZ and SHMIEL
DEUTSCH a/k/a SAM DEUTSCH

DEFENDANTS.
-----X

DATE: December 3, 2015
TIME: 2:50 P.M.

VIDEOTAPED DEPOSITION of the
Defendant, LEV BAIS YAAKOV HIGH SCHOOL, by
a witness, TOVA BOLLAG, taken by the
Respective Parties, pursuant to a Court
Order and to the Federal Rules of Civil
Procedure, held at the offices of The
Berkman Law Office, LLP, 111 Livingston
Street, Brooklyn, New York 11201, before
Breindle Sara Friedman, a Notary Public of
the State of New York.

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A P P E A R A N C E S:

THE BERKMAN LAW OFFICE, LLC
Attorneys for the Plaintiffs
111 Livingston Street
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BY: ROBERT TOLCHIN, ESQ.

RUTHERFORD & CHRISTIE, LLP
Attorneys for the Defendants
800 Third Avenue
New York, New York 10022
BY: ADAM GUZIK, ESQ.
File #: 212.472

ALSO PRESENT:
Nathaniel Armstrong, Videographer
Diamond Reporting & Legal Video

* * *

1 T. BOLLAG

2 Q. What was the red line that you
3 believe -- What was the red line the
4 crossing of which you believe caused the
5 plaintiff to be expelled?

6 A. Would you like me to go into
7 the details of the account that led to the
8 expulsion?

9 Q. I asked you why was she
10 expelled, and correct me if I am wrong, but
11 you said that she crossed a red line. So I
12 asked you what was the red line. If I am
13 mischaracterizing, then set me straight
14 please.

15 A. Within my purview of my job I
16 don't get to make those decisions. That's
17 beyond my scope. I don't have all the
18 information.

19 MR. TOLCHIN: I am going
20 withdraw the question I. Am going to
21 ask you it again.

22 Q. You agree with me the plaintiff
23 was expelled from Lev Bais Yaakov?

24 A. Correct.

25 Q. With the understanding that in

1 T. BOLLAG

2 a minute we are going to talk about phone
3 calls and meetings and conversation and who
4 said what to whom. I am asking for the
5 helicopter view, big picture why was she
6 expelled?

7 A. The school received a call that
8 an inappropriate picture of the girl in
9 question was seen on a high school boy's
10 phone and the information received is that
11 that picture had been passed around several
12 boys' phones in the class.

13 Q. As you understand that, was
14 that the only reason why the plaintiff was
15 expelled?

16 A. I don't have that information.
17 I don't have that knowledge.

18 Q. Did anybody at Lev Bais Yaakov
19 ask you for your professional opinion about
20 whether the plaintiff should be expelled or
21 receive any other form of discipline
22 relating to that picture episode?

23 A. No.

24 Q. So Shmiel Deutsch, Mrs. Oratz,
25 Mrs. Sochaczewski, none of them asked you

1 T. BOLLAG

2 for your professional opinion?

3 A. When the call was received
4 Mrs. Sochaczewski was very alarmed. She
5 called me in, relayed the information.

6 Q. Just say yes or no. Did anyone
7 ask you for your opinion?

8 A. No.

9 Q. You have mentioned that this
10 was a phone call?

11 A. Correct.

12 Q. Tell me about the phone call
13 that you were referring to.

14 A. Mrs. Sochaczewski called me
15 into her office and relayed that she
16 received a phone call. The phone call she
17 relayed to me was made by a local mother
18 who stated that she checks her son's phone
19 and she saw a picture of a girl, a very
20 inappropriate picture on her son's phone.
21 And the girl in question was G.S. a student
22 at Lev Bais Yaakov and she felt it was her
23 duty to inform the school that the student
24 who is in their school has sent such an
25 inappropriate picture to a boy's phone.

1 T. BOLLAG

2 Q. Did Mrs. Sochaczewski tell you
3 anything else?

4 A. She was very alarmed.

5 Q. How did you react?

6 A. I said this is alarming, we
7 need to discuss this and see what to do
8 about this situation. We need to make sure
9 that the parents are made aware of this
10 because such a phone call is, in fact,
11 concerning.

12 Q. Did you say anything else?

13 A. I don't recall the exact words
14 I used. One thing I do remember though is
15 I did warn her in general that to be
16 careful when it comes to inappropriate
17 pictures because there was a recent case
18 that I was made aware of where a highly
19 inappropriate picture was shared with a
20 local schoolteacher or principal and he was
21 arrested for ultimately possessing child
22 pornography. So I just generally warned
23 her to be careful about having possession
24 of such a picture if we don't know the
25 content and nature.

1 T. BOLLAG

2 Q. Who was that teacher who was
3 arrested for child pornography?

4 A. I don't know.

5 Q. What is he convicted?

6 A. I don't know.

7 Q. What school was it?

8 A. I don't know.

9 Q. Where was the school located?

10 A. In the Five Towns. I was at a
11 therapy networking group where someone
12 relayed the story. Another mental health
13 professional.

14 Q. Let's go over a few things that
15 you said. You said the call came from a
16 local mother?

17 A. That is what Mrs. Sochaczewski
18 told me.

19 Q. Do you have any understanding
20 of how she knew that it was a local mother?

21 A. No.

22 Q. Did Mrs. Sochaczewski tell you
23 whether the caller had identified herself?

24 A. She said she did not identify
25 herself.

1 T. BOLLAG

2 Q. Did she tell you whether the
3 mother was asked to identify herself and
4 refused?

5 A. I don't recall.

6 Q. Did she tell you that the
7 mother's -- the caller's phone number
8 appeared in the caller ID of the school?

9 A. No, I don't recall.

10 Q. Did she suggest or did anybody
11 suggest that you get the phone number from
12 caller ID and call the mother -- call the
13 caller back?

14 A. I don't recall.

15 Q. Did she suggest that you get
16 the phone number from caller ID and call
17 the caller back and try to make some
18 arrangement to see the picture?

19 A. I don't recall the exact
20 details, but it is possible.

21 Q. Did you counsel
22 Mrs. Sochaczewski not to call back using
23 the number from caller ID because of what
24 had happened to that teacher in the Five
25 Towns?

1 T. BOLLAG

2 A. I honestly don't recall.

3 Q. You described the picture as
4 being -- you used the word very
5 inappropriate. Do recall giving that
6 testimony?

7 A. Correct.

8 Q. Is that what Mrs. Sochaczewski
9 told you on the date in question?

10 A. I don't recall the exact
11 language.

12 Q. What did she tell you about the
13 picture?

14 A. The mother seemed very alarmed
15 and it was a very inappropriate picture.

16 Q. Other than using the words very
17 inappropriate, did Mrs. Sochaczewski tell
18 you any details about what the mother
19 claimed was in this picture?

20 A. I don't recall.

21 Q. Would you agree that the words
22 very inappropriate could mean different
23 things to different people?

24 A. Yes, I do.

25 Q. Something that one person might

1 T. BOLLAG

2 view as very inappropriate another person
3 might say well, that is not so bad?

4 A. Yes.

5 Q. Would you agree that very
6 inappropriate would include a naked
7 picture, a picture depicting a sexual act?

8 A. It could.

9 Q. Or it could in some people's
10 view just include somebody wearing a
11 article of clothing that maybe was too
12 revealing?

13 A. It could.

14 Q. Would you agree that in Bais
15 Yaakov circles even a one-piece bathing
16 suit would be inappropriate?

17 A. That could be.

18 Q. As you sit here today, do you
19 have any recollection of the kind of
20 inappropriateness Mrs. Sochaczewski told
21 you this mother had brought to the school's
22 attention?

23 A. We never discussed the exact
24 nature and details of what she relayed to
25 my knowledge.

1 T. BOLLAG

2 Q. To your knowledge,
3 Mrs. Sochaczewski never told you whether
4 the picture was alleged to be a naked
5 picture or something else?

6 A. I honestly don't recall the
7 exact details.

8 Q. At the time of
9 Mrs. Sochaczewski telling you what had
10 happened, did you make any notes?

11 A. No.

12 Q. Did you jot anything down?

13 A. No.

14 Q. During the entire time that you
15 have worked in Jewish day schools, have you
16 ever been involved with a situation where
17 somebody called in to report an
18 inappropriate picture?

19 A. No.

20 Q. This is the -- this episode is
21 the only time it ever happened?

22 A. The only episode that I recall,
23 yes.

24 Q. Did you ask Mrs. Sochaczewski
25 how bad was the picture; what did the woman

1 T. BOLLAG

2 say?

3 A. I don't recall.

4 Q. You said Mrs. Sochaczewski told
5 you that the caller had said that the
6 picture was found on her son's phone?

7 A. I believe so.

8 Q. And that it had been passed
9 around her son's high school class?

10 A. I believe so.

11 Q. That is what Mrs. Sochaczewski
12 told you?

13 A. That is what I recall.

14 Q. What grades is high school in
15 the Jewish schools?

16 A. 9th, 10th, 11th, 12th.

17 Q. Mrs. Sochaczewski -- Did you
18 say that Mrs. Sochaczewski told you that
19 the caller had said the girl was G.S., the
20 girl in the picture was G.S.?

21 A. Yes.

22 Q. Did Mrs. Sochaczewski tell you
23 how the caller said she knew that the girl
24 was G.S.?

25 A. I don't recall.

1 T. BOLLAG

2 Q. Did you question how this
3 caller could have known who the girl was in
4 the picture?

5 A. Possibly.

6 Q. Possibly you did question?

7 A. I don't recall the details of
8 the exact conversation.

9 Q. Do you recall anything about
10 the conversation?

11 A. I recall that she relayed these
12 events to me. She was very alarmed. She
13 wanted to share them with Mrs. Oratz, who
14 was not in the building at the time.

15 Q. Where was Mrs. Oratz?

16 A. I believe she was at the post
17 office taking care of some seminary
18 application deadlines for the students and
19 mail them out so they get out in a timely
20 manner before the deadline was up. I
21 suggested we go down to relay these events
22 to Rabbi Deutsch after which we did.

23 Q. It was your suggestion to go
24 down to Rabbi Deutsch?

25 A. I honestly don't recall, but

1 T. BOLLAG

2 possibly.

3 Q. Everything is possible. I am
4 trying to piece together what actually
5 happened. This was a pretty monumental
6 thing that happened. A phone call came in,
7 by the next day a girl who was struggling
8 with school --

9 MR. GUZIK: Do you have a
10 question?

11 MR. TOLCHIN: I am asking it
12 now.

13 Q. A girl was expelled from the
14 school, this was the only time since you
15 have been working --

16 MR. GUZIK: Can you get to the
17 question, Counsel.

18 MR. TOLCHIN: Would you stop
19 interrupting?

20 Q. This is the only time since --

21 MR. GUZIK: Are you testifying
22 for the record or asking a question?

23 Q. This is the only time since you
24 had been working that an episode like this
25 happened?

1 T. BOLLAG

2 A. Correct.

3 Q. It has to have made an impact
4 in your memory, no?

5 A. At this time the decision --
6 the next course of action was not made.
7 This was an event that transpired and the
8 next step was to relay this information to
9 the people that make decisions when events
10 that can be perceived as infractions,
11 behavioral infractions, severe concerns.

12 Q. You testified that you said to
13 Mrs. Sochaczewski that what she told you
14 was alarming?

15 A. Correct.

16 Q. Is it your testimony that you
17 were alarmed because Mrs. Sochaczewski said
18 somebody said they have an inappropriate
19 picture, that is what was alarming, an
20 inappropriate picture, nothing more than
21 that?

22 A. In the circle of school for a
23 girl to be in contact with a boy and send
24 pictures of herself that any mother would
25 call inappropriate is concerning.

1 T. BOLLAG

2 Q. Because a mother who you don't
3 know who it is, who don't know if she is
4 even a mother, she's just a voice on the
5 phone, because she says I found an
6 inappropriate picture, you, Tova Bollag,
7 assume that the picture was indeed
8 inappropriate?

9 A. I am concerned about the
10 situation.

11 Q. You become concerned?

12 A. About the situation, yes.

13 Q. How did you know that the girl,
14 the plaintiff, actually sent the picture to
15 the boy?

16 A. I did not know.

17 Q. Were there other ways that a
18 boy might obtain a picture of a girl other
19 than the girl sending it to him?

20 A. Yes, there are other ways.

21 Q. In fact, are there other ways
22 that a girl could -- that a boy could
23 obtain an inappropriate picture of a girl
24 other than the girl sending?

25 A. I am sure there are.

1 T. BOLLAG

2 Q. Are there even ways that a boy
3 could obtain a disrobed picture of a girl
4 without the girl sending it?

5 A. There are although unlikely,
6 but there are.

7 Q. Have you heard of situations
8 where where people set up cameras and take
9 pictures in locker rooms and dressing
10 rooms?

11 MR. GUZIK: Counsel, anything
12 can happen. Why are you asking
13 questions --

14 MR. TOLCHIN: Would you stop
15 interrupting. That's a speaking
16 objection, Counsel. The word is
17 objection. If you have an objection,
18 say the word objection and state the
19 rule of evidence you are objecting
20 on. Otherwise, you may not speak or
21 coach the witness, which is what you
22 just did. Stop it.

23 MR. GUZIK: Don't talk to me
24 like a child. Objection.

25 MR. TOLCHIN: I will talk to

1 T. BOLLAG

2 you like a lawyer who is making
3 improper speaking objection.

4 Q. Ma'am, have you heard of
5 instances where people have obtained
6 pictures of women in dressing rooms, locker
7 rooms, bathrooms, mikvahs, without the
8 women's knowledge?

9 MR. GUZIK: Objection.

10 MR. TOLCHIN: Go ahead. You
11 can answer.

12 A. Yes.

13 Q. You have heard of all those
14 instances?

15 A. Not all, but some.

16 Q. Which ones have you heard of?

17 A. Locker room. I think that was
18 the store in the dressing room.

19 Q. You heard of the mikvah rabbi?

20 A. No.

21 Q. Rabbi Barry Freundel in
22 Washington who had a camera in the mikvah
23 for years taking pictures of women hidden
24 in a clock radio?

25 A. Nebach.

1 T. BOLLAG

2 Q. You never heard of that?

3 A. No.

4 Q. He went to jail. It was in all
5 of the newspapers.

6 MR. GUZIK: Is that a question?

7 Q. You didn't hear of that?

8 MR. GUZIK: She already
9 answered that.

10 A. No.

11 MR. TOLCHIN: Can you stop
12 making speaking objections.

13 MR. GUZIK: Can you ask
14 appropriate questions?

15 Q. As you sit here today you have
16 no recollection of what Mrs. Sochaczewski
17 said was inappropriate about the picture
18 that the caller claimed to have received;
19 is that correct?

20 A. Please state the question
21 again.

22 Q. As you sit here today you have
23 no recollection of what it was about the
24 alleged picture that was inappropriate?

25 A. Correct.

1 T. BOLLAG

2 Q. Did she tell you it was a naked
3 picture?

4 A. No.

5 Q. What was it about the picture
6 that you thought might constitute child
7 pornography?

8 A. I didn't state that this
9 picture constituted child pornography. I
10 warned them that in general it's important
11 when and if someone were to send such a
12 picture to your phone in the events that it
13 would constitute child pornography. If
14 somebody is saying the picture is highly
15 inappropriate or very inappropriate it
16 might fall under that category. You have
17 to take extra caution if you are to possess
18 that.

19 Q. Would you agree with me that in
20 the Bais Yaakov world a mother might
21 describe a picture as being inappropriate
22 even if all that is in the picture is a
23 girl and a boy walking down the street
24 holding hands?

25 A. Possibly.

1 T. BOLLAG

2 Q. That would be also
3 inappropriate, right?

4 A. Could be.

5 Q. It wouldn't remotely be child
6 pornography?

7 A. That would not be child
8 pornography, no.

9 Q. Did Mrs. Sochaczewski tell you
10 that she had asked the caller to send her a
11 copy of the picture?

12 A. I don't recall.

13 Q. Did she tell you that the
14 caller had told her that the caller's
15 husband was a lawyer and that he had
16 advised her not to send the picture to
17 anybody and to delete it?

18 A. I don't recall.

19 Q. Did Mrs. Sochaczewski tell you
20 that the caller had said that her husband
21 had said that the picture would constitute
22 child pornography and must be deleted?

23 A. I don't recall.

24 Q. She didn't tell you?

25 A. I really don't remember.

1 T. BOLLAG

2 THE VIDEOGRAPHER: This marks
3 the end of tape one. Time is 3:54
4 p.m. on December 3, 2015. We are now
5 off the record.

6 (Whereupon, a recess was
7 taken.)

8 THE VIDEOGRAPHER: This marks
9 the beginning of tape two in the
10 deposition of Tova Bollag. Time is
11 4:01 p.m. on December 3, 2015. We
12 are now back on the record. You may
13 proceed.

14 MR. TOLCHIN: Can you read back
15 the last question and answer.

16 (Whereupon, the referred-to
17 question and answer were read back by
18 the Reporter.)

19 Q. Did Mrs. Sochaczewski tell you
20 whether she recognized the caller's voice?

21 A. No.

22 Q. Did she tell you she knew what
23 school the boy attended?

24 A. She may have said the name of
25 the school, but it doesn't stick in my

1 T. BOLLAG

2 memory.

3 Q. If there was a picture, an
4 inappropriate picture of the plaintiff,
5 would it not have been inappropriate for
6 the boy to be in possession of that picture
7 as well?

8 A. Probably yes.

9 Q. Were you concerned about the
10 boy?

11 A. He was not my student in the
12 school where I worked.

13 Q. You're only concerned about the
14 school where you work?

15 A. No. Particularly because the
16 boy's mother was calling I didn't think
17 that I needed to --

18 Q. Didn't she --

19 A. -- think about that.

20 Q. Didn't she say the boy had
21 passed the picture -- or that the picture
22 had been passed around among his friend?

23 A. I didn't receive the phone
24 call. This is secondhand information I
25 received from Mrs. Sochaczewski.

1 T. BOLLAG

2 Q. Didn't Mrs. Sochaczewski tell
3 you that the caller had said that the
4 picture had been passed around?

5 A. Yes.

6 Q. Were you concerned about those
7 boys who were passing the picture around?

8 A. Now that you bring it to my
9 attention there are lot of things that are
10 concerning.

11 Q. Did you think to call back the
12 caller --

13 A. No, I did not.

14 Q. And encourage her to report it
15 to her son's school the same way she was
16 reporting it to the plaintiff's school?

17 A. No, I did not.

18 Q. Did you wonder why the caller
19 was reporting this to the school rather
20 than calling G.S.' parents?

21 A. It seems that in Brooklyn
22 parents often make phone calls of that
23 nature to inform schools of infractions or
24 concerning issues involving students.

25 Q. In Brooklyn parents often call

1 T. BOLLAG

2 schools to make calls of this nature?

3 A. That they -- yes. That has
4 been my experience.

5 Q. What do you mean calls of this
6 nature?

7 MR. GUZIK: Objection.

8 A. For example, I recall someone
9 sharing with me a parent called to say a
10 student was seen on the local avenue
11 wearing certain clothing that wouldn't meet
12 the school's standard dress code.

13 Q. What school was that in
14 connection with?

15 A. In Lev Bais Yaakov.

16 Q. The local avenue was Avenue M,
17 Avenue J, what was the local --

18 A. Someone shared this information
19 with me secondhand. I didn't receive the
20 phone call, but a parent --

21 Q. What would be the purpose of
22 calling a school to say that a girl had
23 been seen dressed in some way that was not
24 in accordance with the school's standards?

25 A. I don't know. I wouldn't make

1 T. BOLLAG

2 that phone call.

3 Q. Why wouldn't you make such a
4 phone call?

5 A. Because to me that is not
6 concerning.

7 Q. You mean you think they should
8 mind their own business?

9 A. I think everyone should raise
10 their own children, yes.

11 Q. Would you agree with me that
12 calling a school to report a student for
13 violation of the school's rules is
14 something that is likely to get the student
15 in trouble with the school?

16 A. Possibly.

17 Q. Would you agree that if a
18 person was genuinely concerned about the
19 welfare of the child it would be a better
20 approach to call the child's parents?

21 A. In most circumstances, yes.

22 Q. As a social worker experienced
23 working in schools, do you believe that the
24 fact that a caller chooses to call the
25 school rather than calling the parents

1 T. BOLLAG

2 might suggest a motive to get the girl in
3 trouble?

4 A. I can't really answer that.

5 Q. You have no idea?

6 A. It may be a way from their
7 perspective to possibly help the student
8 without involving their parents if they
9 think that that would be beneficial for the
10 student. I don't know what they were
11 thinking. I am not them.

12 Q. It's a possible motive?

13 A. Is it possible, it's possible.
14 As you said, anything is possible.

15 Q. Did you think to call the
16 caller back --

17 A. No, I didn't.

18 Q. -- and ask for the names of the
19 other kids so you could call their parents?

20 A. No.

21 Q. Or to encourage that mother, if
22 there was a mother, to call the parents?

23 A. Nope.

24 Q. Did it occur to you when you
25 heard this story from Mrs. Sochaczewski

1 T. BOLLAG

2 that possibly the caller was not what she
3 claimed to be?

4 A. It's always a possibly, yes.

5 Q. It's possible it was somebody
6 with an axe to grind?

7 A. Is it possible, yes, it's
8 possible.

9 Q. It's possible it was somebody
10 who wanted to get G.S. in trouble?

11 A. Yes.

12 Q. It's possible it might be
13 somebody with a beef against G.S.' family?

14 A. Possible, yes.

15 Q. How do you know that wasn't
16 what happened?

17 A. I didn't know.

18 Q. If the picture in question was
19 a naked picture, if you had been told that
20 the caller had said the picture was a naked
21 picture of G.S., would that have raised any
22 concerns for you as a social worker?

23 A. Yes.

24 Q. What would be the concerns that
25 it would have raised?

1 T. BOLLAG

2 A. Any time you hear about
3 something inappropriate to that level it's
4 additional potential concerns and harms for
5 that child in question. You also have to
6 make sure the story is factual and verified
7 details before acting upon anything. That
8 would be even more concerning, yes.

9 Q. What would be the concerns that
10 you would have if you had been told that
11 the picture was a naked picture?

12 A. It's just a deeper concern that
13 a student would have a picture like that
14 and send it out. That is very concerning
15 for a student in our school.

16 Q. How old was the plaintiff at
17 that time?

18 A. You tell me. She's a high
19 school student.

20 Q. In tenth grade?

21 A. Tenth grade.

22 Q. 14, 15. Certainly not an
23 adult?

24 A. Correct. Definitely not an
25 adult.

1 T. BOLLAG

2 Q. Would you be concerned -- On
3 hearing that it's a naked picture, would
4 you be concerned the plaintiff had been
5 exploited in some way?

6 A. There is that possibility.

7 Q. Somebody might have tricked her
8 into making such a picture?

9 A. There is that possibility.

10 Q. If any adult had taken the
11 picture, that would be criminal, wouldn't
12 it?

13 A. Yes.

14 Q. You are a mandated reporter,
15 aren't you?

16 A. Yes.

17 Q. If you had been told that it
18 was a naked picture that a boy was in
19 possession of a minor, a boy was in
20 possession of a naked picture of a minor
21 and his mother, father had the picture and
22 other boys in the class, is that something
23 that you would have to report as a mandated
24 reporter?

25 A. If I had factual firsthand

1 T. BOLLAG

2 knowledge of a such a picture, yes, I
3 would.

4 Q. You agree you did not have
5 factual firsthand knowledge of such a
6 picture?

7 A. Me, Tova Bollag, no, I did not
8 have factual firsthand knowledge.

9 Q. I understand you say you don't
10 recall what Mrs. Sochaczewski told you
11 about the content of the picture?

12 A. Correct.

13 Q. Just for the moment assume that
14 at the time she told you that it was a
15 naked picture. Would that have been enough
16 knowledge for you to have to be mandated to
17 make a report or would you have had to
18 verify the information in some other way?

19 A. I would probably consult with
20 my supervisor to ascertain what I should do
21 in such a circumstance.

22 Q. Your supervisor at the school?

23 A. No.

24 Q. Your supervise where?

25 A. Outside of the school.

1 T. BOLLAG

2 Q. What kind of supervisor?

3 A. Social work supervisor or any
4 NSW I would call up and say I had this
5 experience. You call in anonymously and
6 get information and guidance in the
7 profession.

8 Q. If you had been told it was a
9 naked picture, would that have been enough
10 for you call in and seek guidance?

11 A. I would first like to get more
12 information from the parents about the
13 circumstances and the nature of the
14 situation.

15 Q. If you had been told that it
16 was a naked picture, then you would have
17 wanted to get additional information from
18 the parents in order to make a
19 determination whether it was necessary to
20 report, is that what you are saying?

21 A. Probably, yes.

22 Q. The fact -- in fact, you did
23 not call the parents to seek additional
24 information, correct?

25 A. I gave over this information to

1 T. BOLLAG

2 the dean of the school which --

3 Q. Who is not a licensed social
4 worker?

5 A. -- which is protocol and he
6 called in the parents together with the
7 principals.

8 Q. But you did not call the
9 parents to obtain additional information?

10 A. No, I did not.

11 Q. You did make a report?

12 A. No, I did not.

13 Q. Does the fact that you did not
14 call the parents and you did not make a
15 report suggest to you looking back that
16 Mrs. Sochaczewski did not tell you it was a
17 naked picture?

18 A. I did text the mother to find
19 out if this was factual, if there is any
20 evidence that this existed and she reported
21 that it's not true.

22 Q. When did you text the mother?

23 A. After these events happened.

24 Q. After the expulsion?

25 A. No, not after the expulsion. I